

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MINTEL INTERNATIONAL GROUP,)
LTD., a United Kingdom corporation,)
)
)
Plaintiff/Counter-Defendant,) Case No. 08-cv-3939
) Judge Robert Dow, Jr.
v.) Magistrate Judge Maria Valdez
MEESHAM NEERGHEEN, an individual)
)
Defendant/Counter-Plaintiff.)
)

PROPOSED SCHEDULING ORDER

Defendant and Counter-plaintiff Meesham Neergheen (“Neergheen”) submits his Rule 16(b) proposed scheduling order as follows:¹

1. Discovery

The following time limits and deadlines shall be applicable:

- A. All disclosures required by Rule 26(a)(1) shall be made on or before September 11, 2008.
- B. Any amendments to pleadings or actions to join other parties shall be filed on or before September 15, 2008.
- C. The cutoff of fact discovery is December 31, 2008.
- D. The parties shall disclose expert testimony pursuant to Rule 26(a)(2) on or before October 15, 2008.

¹ Counsel for Mintel indicated that Plaintiff/ Counter-Defendant agreed with the dates herein. However, as counsel for Mintel could not be reached to confirm authority to file on Mintel’s behalf, Neergheen files the present Proposed Order alone.

- E. The parties may depose the other side's expert at any time prior to October 31, 2008.
- F. The parties shall disclose any rebuttal expert pursuant to Rule 26(a)(2)(c) at any time prior to November 15, 2008.
- G. The parties shall have until November 30, 2008 to depose the opposing party's rebuttal expert.

2. Motions

- A. Any dispositive motions to be filed on or before January 31, 2009.
- B. Any *Daubert* motions to be filed on or before February 15, 2009.

3. Final Pretrial Order and Conference

The final pretrial order shall be filed on or before March 1, 2009.

The final pretrial conference will be held on _____ at _____.m. (This date and time will be set by the Court at the Rule 16 conference.)

4. Trial

Trial is set in this matter on _____ at 10:00 a.m. (The trial date will be set by the Court at the Rule 16 conference.)

5. Status Hearings

A further status hearing/ preliminary pretrial conference should be held on _____.

ENTERED:

Dated: _____

HON. MARIA VALDEZ
United States Magistrate Judge

Respectfully submitted,

/s/ Jeana R. Lervick

John T. Roache
Jeana R. Lervick
Joel C. Griswold
BELL, BOYD & LLOYD LLP
70 West Madison Street
Suite 3100
Chicago, Illinois 60602
312.372.1121
312.827.8000 (facsimile)

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of **Proposed Scheduling Order** has been served this 22nd day of August, 2008 via ECF filing to:

Joseph Marconi
Victor Pioli
Katherine J. Pronk
JOHNSON & BELL, LTD.
33 West Monroe Street
Suite 2700
Chicago, Illinois 60603

/s/ Jeana R. Lervick

Jeana R. Lervick
BELL, BOYD & LLOYD LLP
70 West Madison Street
Suite 3100
Chicago, IL 60602
(312) 373-1121